

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W.R. GRACE & CO., <i>et al.</i> ,) Case No. 01-1139 (JKF)
) Jointly Administered
Debtors.)
) Objection Date: August 28, 2009 @ 4:00 p.m.
) Hearing Date: September 8, 2009 @ 11:00 a.m. in
) Pittsburgh, Pennsylvania

**NOTICE OF THE PLAN PROPONENTS' MOTION TO EXCLUDE OR LIMIT
TESTIMONY OF JAMES B. SHEIN PURSUANT TO *DAUBERT* AND RULES
702 AND 703 OF THE FEDERAL RULES OF EVIDENCE**

TO: All Parties on the Attached List

PLEASE TAKE NOTICE, that on August 14, 2009, the Plan Proponents filed and served the attached **Motion To Exclude or Limit Testimony of James B. Shein Pursuant To *Daubert* and Rules 702 and 703 of The Federal Rules of Evidence** (the "Motion"), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Wilmington, Delaware 19801. A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing and filed with the Bankruptcy Court on or before August 28, 2009 at 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that a copy of any responses or objections must also be served upon the following: (i) co-counsel for the Debtors, Theodore L. Freedman, Kirkland & Ellis LLP, Citigroup Center, 601 Lexington Avenue, New York, NY 10022-4611 (fax number 212-446-4800), Janet S. Baer, The Law Offices of Janet S. Baer, P.C., 70 West Madison Street, Suite 2100, Chicago, IL 60602 (Fax number 312-641-2165); and James E. O'Neill, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, PO. Box

8705, Wilmington, DE 19899-8705 (Courier 19801) (fax number 302-652-4400); (ii) counsel to the Official Committee of Unsecured Creditors, Lewis Kruger, Stroock & Stroock & Lavan, 180 Maiden Lane, New York, NY 10038-4982 (fax 212-806-6006), and Michael R. Lastowski, Duane, Morris & Heckscher, LLP, 1100 N. Market Street, Suite 1200, Wilmington, DE 19801-1246 (fax 302-657-4901); (iii) counsel to the Official Committee of Property Damage Claimants, Scott L. Baena, Bilzin, Sumberg, Dunn, Baena, Price & Axelrod, First Union Financial Center, 200 South Biscayne Boulevard, Suite 2500, Miami, FL 33131 (fax 305-374-7593), and Michael B. Joseph, Ferry & Joseph, P.A., 824 Market Street, Suite 904, P.O. Box 1351, Wilmington, DE 19899 (fax 302-575-1714); (iv) counsel to the Official Committee of Personal Injury Claimants, Elihu Inselbuch, Caplin & Drysdale, Chartered, 375 Park Avenue, 35th Floor, New York, NY 10152-3500 (fax 212-644-6755), and Mark T. Hurford, Campbell & Levine, LLC, 800 N. King Street, Suite 300, Wilmington, DE 19801 (fax 302-426-9947); (v) counsel to the Official Committee of Equity Holders, Philip Bentley, Kramer Levin Naftalis & Frankel LLP, 919 Third Avenue, New York, NY 10022 (fax 212-715-8000), and Teresa K.D. Currier, Saul Ewing LLP, 222 Delaware Avenue P.O. Box 1266, Wilmington, DE 19899-1397 (fax 302-421-6813); (vi) counsel to the Future Claimants' Representative, Richard H. Wyron, Orrick, Herrington & Sutcliffe LLP 1152 15th Street, NW, Washington, DC 20005 (fax 202 339-8500), and John C. Phillips, Jr., Phillips, Goldman & Spence, P.A., 1200 North Broom Street, Wilmington, DE 19806 (fax 302-655-4210); (vii) the Office of the United States Trustee, Attn: David Klauder, 844 N. King Street, Wilmington, DE 19801 (fax 302-573-6497); and (viii) counsel to the Property Damage Future Claimants' Representative, Karl Hill, Seitz, Van Ogtrop & Green, P.A., 222 Delaware Avenue, Suite 1500, P.O. Box 68, Wilmington, DE 19899 (fax 302-888-0606) and Alan B. Rich, Law Office of Alan B. Rich, Esq., 1201 Main Street, Suite 1910, LB 201, Dallas,

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IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE JUDITH K. FITZGERALD, UNITED STATES BANKRUPTCY JUDGE, IN HER COURTROOM IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA, 5464 U.S. STEEL TOWER, 600 GRANT STREET, PITTSBURGH, PENNSYLVANIA 15219.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: August 14, 2009
Wilmington, Delaware

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